

EXHIBIT B

Lisa Ranieri

From: Shen, Andrew C. <ashen@kellogghansen.com>
Sent: Thursday, May 20, 2021 7:11 PM
To: 'Carter, Sean'; Steven R. Pounian; Lisa Ranieri; Kellogg, Michael K.; Rapawy, Gregory G.; Huppert, Matthew R.; 'rkry@mololamken.com'; 'enitz@mololamken.com'; Jim Kreindler; Andrew J. Maloney; Megan Benett; zScott Tarbutton; zRobert Haefele; Goldman, Jerry; John Fawcett
Subject: RE: In Re: Terrorist Attacks on September 11, 2001

Sean –

The reason we are taking these depositions is because of Plaintiffs' untimely disclosure that you intend to submit declarations from these non-parties. Plaintiffs have also not responded to our inquiry as to whether you expect Senator Kerrey, Secretary Lehman, Mr. Ben-Veniste, and Ms. Hunt to submit additional declarations. Please do so.

Saudi Arabia intends to subpoena depositions on the following dates, subject to our review of the declarations. Given Plaintiffs' untimely disclosures, some double tracking of depositions will be necessary.

1. Dieter Snell - June 7
2. Raj De - June 8
3. Usman Madha - June 8
4. Kaysan Morgan – June 14
5. Sam Coombs - June 15
6. Keller School of Graduate Management - June 21
7. Efrain Vasquez - June 22
8. Danny Gonzalez –June 23
9. Judith & Ed Chmielewski - June 24, 25

Please advise immediately if Plaintiffs wish to meet and confer concerning any of these dates. Otherwise, we will prepare subpoenas. We will also reach out to counsel for witnesses, where known, to ask whether they wish to meet and confer concerning the dates.

Regards,

Andy

Andrew C. Shen
Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, D.C. 20036
Direct: (202) 326-7963
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From: Carter, Sean <SCarter1@cozen.com>

Sent: Thursday, May 20, 2021 12:50 PM

To: Shen, Andrew C. <ashen@kelloggghansen.com>; 'Steven R. Pounian' <Spounian@kreindler.com>; Lisa Ranieri <LRanieri@kreindler.com>; Kellogg, Michael K. <mkellogg@kelloggghansen.com>; Rapawy, Gregory G. <grapawy@kelloggghansen.com>; Huppert, Matthew R. <mhuppert@kelloggghansen.com>; 'rkry@mololamken.com' <rkry@mololamken.com>; 'enitz@mololamken.com' <enitz@mololamken.com>; Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; Tarbutton, Joseph <starbutton@cozen.com>; zRobert Haefele <rhaefe@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; WTC[jfawcett@kreindler.com] <jfawcett@kreindler.com>

Subject: [EXTERNAL] RE: In Re: Terrorist Attacks on September 11, 2001

Andy – We are collecting the declarations available at this time and will provide them to you tomorrow. Additional declarations will be sent to you before the end of this month. In terms of your inquiry about dates, we will need to know which witnesses you intend to depose on each of the dates in order to assess our availability. We note that virtually all of the witnesses identified on plaintiffs' declarant list have been long known to the Kingdom.

The Kingdom specifically requested and had the right to conduct fact depositions but made a strategic decision not to pursue depositions of any of these witnesses, despite having ample opportunity to do so. We are eager for them to testify in person and are of course amenable to working with you to make that happen. However, we have engaged in careful planning for the next few weeks in order to manage the demands posed by the short deposition window and impending Kingdom and merits/jurisdiction expert deposition deadlines, and the Kingdom's decision to sit on its rights as to these witnesses throughout the discovery period should not interfere with plaintiffs' planning and preparations for depositions previously noticed.

Best, Sean



Sean P. Carter

Member | Cozen O'Connor

One Liberty Place, 1650 Market Street Suite 2800 | Philadelphia, PA 19103

P: 215-665-2105 F: 215-701-2105

Email | Bio | LinkedIn | Map | cozen.com

From: Shen, Andrew C. <ashen@kelloggghansen.com>

Sent: Wednesday, May 19, 2021 2:13 PM

To: 'Steven R. Pounian' <Spounian@kreindler.com>; Lisa Ranieri <LRanieri@kreindler.com>; Kellogg, Michael K. <mkellogg@kelloggghansen.com>; Rapawy, Gregory G. <grapawy@kelloggghansen.com>; Huppert, Matthew R. <mhuppert@kelloggghansen.com>; 'rkry@mololamken.com' <rkry@mololamken.com>; 'enitz@mololamken.com' <enitz@mololamken.com>; WTC[jkreindler@kreindler.com] <jkreindler@kreindler.com>; WTC[amaloney@kreindler.com] <amaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; Carter, Sean <SCarter1@cozen.com>; Tarbutton, J. Scott <STarbutton@cozen.com>; zRobert Haefele <rhaefe@motleyrice.com>; WTC[jgoldman@andersonkill.com] <jgoldman@andersonkill.com>; WTC[jfawcett@kreindler.com] <jfawcett@kreindler.com>

Subject: RE: In Re: Terrorist Attacks on September 11, 2001

****EXTERNAL SENDER****

Steve –

We disagree that Plaintiffs' disclosures were timely.

Pursuant to Paragraph 8 of the Court's May 11, 2020 Order, and subject to our review of the actual declarations from these witnesses, we are providing notice to Plaintiffs that we intend to depose each of the witnesses listed in your May 17 letter and May 18 email. We request that Plaintiffs produce any declarations immediately, so that we can make final determinations as to whether to move forward with these depositions and for scheduling purposes.

Given the depositions already scheduled for June, the impending close of fact discovery, and Plaintiffs' untimely disclosure of these declarants, Saudi Arabia may need to request consent from Plaintiffs and/or seek leave of court for expedited depositions pursuant to paragraph 16 of the deposition protocol. Please let us know your availability for depositions on June 1-4, 7, 8, 14-15, and 21-25.

Regards,

Andy

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From: Steven R. Pounian <Spounian@kreindler.com>

Sent: Tuesday, May 18, 2021 3:34 PM

To: Shen, Andrew C. <ashen@kellogghansen.com>; Lisa Ranieri <LRanieri@kreindler.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>; 'rkry@mololamken.com' <rkry@mololamken.com>; 'enitz@mololamken.com' <enitz@mololamken.com>; Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; Megan Bennett <Mbenett@kreindler.com>; 'SCarter1@cozen.com' <SCarter1@cozen.com>; Tarbutton, Joseph <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; John Fawcett <jfawcett@kreindler.com>

Subject: [EXTERNAL] RE: In Re: Terrorist Attacks on September 11, 2001

Dear Andy,

We timely provided the names of the fact witnesses from whom we expect declarations.

If you want to depose any of the fact witnesses, we will arrange for service of the subpoena. As to Keller Management School - we are reaching out to our contact to confirm that they are agreeable to accept service.

Please be advised that the following witnesses on our list are represented by counsel:

1. Samuel Coombs

Al Agricola
Agricola Law
127 S. 8th Street
Opelika AL 36801
(334) 610-1064
al@agricolalaw.com

2. Kaysan Morgan

Donald Wilson, Jr.
Broening Oberg Woods & Wilson
2800 N. Central Avenue, Suite 1600
Phoenix, Arizona 85004
(602) 271-7717
Fax: (602) 258-7785
dwj@bowwlaw.com

3. Usman Madha

Michael V. Schafner
Cohen Williams LLP
724 South Spring Street, 9th Floor
Los Angeles, CA 90014
Tel: 213-232-5160
Cell: 818-618-9128
Fax: 213-232-5167
mschafner@cohen-williams.com

4. Judith Chmielewski and Ed Chmielewski

Melanie S. Morgan
Morgan Pilate LLC
926 Cherry Street
Kansas City, MO 64106
mmorgan@morganpilate.com
(816) 471-6694 (office)
(913) 707-1990 (cell)

The fact witnesses who have previously provided declarations are:

1. Senator Joseph Robert “Bob” Kerrey
2. Secretary John F. Lehman
3. Richard Ben-Veniste
4. Catherine Hunt

If you are interested in deposing the three 9/11 Commission Members we will reach out to them using the most recent contact information we have available to coordinate. If you want to depose Catherine Hunt regarding the fact statements in her declarations, we will arrange service of the subpoena.

Steve

Steven R. Pounian
Of Counsel



Kreindler & Kreindler LLP
485 Lexington Ave
New York, NY 10017

T: 212.973.3477 · E-mail: spounian@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

Please consider the environment before printing this e-mail.

From: Shen, Andrew C. <ashen@kellogghansen.com>

Sent: Tuesday, May 18, 2021 10:06 AM

To: Lisa Ranieri <LRanieri@kreindler.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>; 'rkry@mololamken.com' <rkry@mololamken.com>; 'enitz@mololamken.com' <enitz@mololamken.com>; Steven R. Pounian <Spounian@kreindler.com>; Jim Kreindler <JKreindler@kreindler.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; 'SCarter1@cozen.com' <SCarter1@cozen.com>; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; John Fawcett <jfawcett@kreindler.com>

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Steve –

Under paragraph 9 of the deposition protocol, Plaintiffs were required to “identify any fact witnesses from who they have reason to expect they will present a declaration 45 days before the deadline for fact depositions, and if requested, provide the addresses of those witnesses so that they may be subpoenaed for depositions.” The list you provided in your May 17, 2021 letter did not comply with this deadline, and accordingly, Plaintiffs have waived any ability to submit declarations from any of these individuals.

In any event, please provide the address for each individual listed in your May 17 letter. Please also inform us whether you are authorized to accept service for any witnesses, such as Danny Gonzalez, as well as the identity of any counsel representing any of these witnesses.

Your letter also references “declarations of fact witnesses that have previously been disclosed or are in the public record.” Please identify the specific fact witnesses that your letter refers to, these witnesses’ addresses, and the identity of any counsel representing these witnesses.

Regards,

Andy


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From: Lisa Ranieri <LRanieri@kreindler.com>
Sent: Monday, May 17, 2021 8:46 PM
To: Kellogg, Michael K. <mkellogg@kelloggghansen.com>; Rapawy, Gregory G. <grapawy@kelloggghansen.com>; Shen, Andrew C. <ashen@kelloggghansen.com>; Huppert, Matthew R. <mhuppert@kelloggghansen.com>; 'rkry@mololamken.com' <rkry@mololamken.com>; 'enitz@mololamken.com' <enitz@mololamken.com>; Steven R. Pounian <Spounian@kreindler.com>; Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; 'SCarter1@cozen.com' <SCarter1@cozen.com>; Tarbutton, Joseph <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; John Fawcett <jfawcett@kreindler.com>
Subject: [EXTERNAL] In Re: Terrorist Attacks on September 11, 2001

Dear Counsel,
Please see the attached correspondence.

Lisa Ranieri
Legal Secretary to Steven R. Pounian

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Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

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